

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION  
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT  
SECURITIES LLC,

Defendant.

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the  
Substantively Consolidated SIPA Liquidation  
of Bernard L. Madoff Investment Securities  
LLC and the Chapter 7 Estate of Bernard L.  
Madoff,

Plaintiff,

v.

ABN AMRO BANK (IRELAND) LTD. (f/k/a  
FORTIS PRIME FUND SOLUTIONS BANK  
(IRELAND) LIMITED) and ABN AMRO  
CUSTODIAL SERVICES (IRELAND) LTD.  
(f/k/a FORTIS PRIME FUND SOLUTIONS  
CUSTODIAL SERVICES (IRELAND)  
LTD.),

Defendants.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

Adv. Pro. No. 10-05355 (CGM)

**STIPULATION AND ORDER TO ADJOURN ARGUMENT DATE**

Irving H. Picard (the “Trustee”), as trustee for the substantively consolidated liquidation of the business of Bernard L. Madoff Investment Securities LLC under the Securities Investor Protection Act, 15 U.S.C. §§ 78aaa–III, and the Chapter 7 estate of Bernard L. Madoff, individually, and defendants ABN AMRO Bank (Ireland) Ltd (f/k/a Fortis Prime Fund Solutions Bank (Ireland) Limited) and ABN AMRO Custodial Services (Ireland) Ltd. (f/k/a Fortis Prime Fund Solutions Custodial Services (Ireland) Ltd.) (together, “Defendants” and collectively, with

the Trustee, the “Parties”), by and through their respective, undersigned counsel, hereby stipulate and agree in this Stipulation and Order as follows:

**WHEREAS**, on June 17, 2022, on consent by Defendants, the Trustee filed a Second Amended Complaint (the “SAC”). ECF No. 205.

**WHEREAS**, on August 19, 2022, Defendants filed a Motion to Dismiss the SAC (the “Motion”), which lists January 18, 2023 as the hearing date. ECF No. 208.

**WHEREAS**, the Trustee timely filed an opposition to the Motion on August 18, 2022. ECF No. 214.

**WHEREAS**, Defendants’ reply in further support of the Motion is due on December 2, 2022.

**WHEREAS**, the Parties have agreed to request that the hearing on the Motion be adjourned from January 18, 2023 to February 15, 2023, at 10:00 a.m.

**IT IS HEREBY STIPULATED AND AGREED**, by and between the Parties, and **SO ORDERED**, by the Court that the hearing on Defendant’s Motion be adjourned from January 18, 2023 to February 15, 2023 at 10:00 a.m.

*[Signatures on following page]*

Dated: November 22, 2022  
New York, New York

**BAKER & HOSTETLER LLP**

By: /s/ Regina Griffin  
45 Rockefeller Plaza  
New York, New York 10111  
Telephone: (212) 589-4200  
Facsimile: (212) 589-4201  
David J. Sheehan  
Email: dsheehan@bakerlaw.com  
Regina Griffin  
Email: rgriffing@bakerlaw.com

*Attorneys for Irving H. Picard, Trustee  
for the Substantively Consolidated SIPA  
Liquidation of Bernard L. Madoff Investment  
Securities LLC and the Chapter 7 Estate of  
Bernard L. Madoff*

**LATHAM & WATKINS LLP**

By: /s/ Thomas Giblin  
1271 Avenue of the Americas  
New York, New York 10020  
Telephone: (212) 906-1200  
Christopher Harris  
Email: Christopher.harris@lw.com  
Thomas Giblin  
Email: Thomas.giblin@lw.com

*Attorneys for Defendants ABN AMRO  
Bank (Ireland) Ltd (f/k/a Fortis Prime  
Fund Solutions Bank (Ireland) Limited)  
and ABN AMRO Custodial Services  
(Ireland) Ltd. (f/k/a Fortis Prime Fund  
Solutions Custodial Services (Ireland)  
Ltd.)*

**Dated: November 22, 2022  
Poughkeepsie, New York**



**/s/ Cecelia G. Morris**

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**Hon. Cecelia G. Morris  
U.S. Bankruptcy Judge**